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Attorneys for Defendant COUNTY OF ORANGE, a public entity

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

DOROTHY "DEE" AGRACEWICZ,  
Individually; and on behalf of THE  
ESTATE OF KEVIN MORRIS,

Plaintiff,

V.

THE COUNTY OF ORANGE, a  
Governmental Entity; and DOES 1-100,  
inclusive.

## Defendants.

CASE NO.: 8:19-cv-00251-JLS-KESx  
(Consolidated with Case No.: 8:19-cv-00350-JLS-KESx)

BEFORE THE HONORABLE  
JOSEPHINE L. STATON

[DISCOVERY DOCUMENT:  
REFERRED TO MAGISTRATE  
JUDGE KAREN E. SCOTT]

**[PROPOSED] PROTECTIVE  
ORDER FOR DEPOSITIONS AND  
DOCUMENTS**

**HEARING DATES PENDING:**

Type: Final Pretrial Conference

Date: March 6, 2020  
Title: 10-30

Time: 10:30 a.m.  
Date: 10/1

Dept: 10A

JACK MORRIS, individually and as  
Successor in Interest to KEVIN MORRIS,  
deceased.

Plaintiff,

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THE COUNTY OF ORANGE, a  
municipal entity, and DOES 1 through 10,  
inclusive.

## Defendants.

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GOOD CAUSE APPEARING, and in accordance with the parties' Stipulation re Protective Order for Depositions and Documents (Dkt. 30), IT IS HEREBY ORDERED that Defendant COUNTY OF ORANGE, a public entity, Plaintiff DOROTHY "DEE" AGRACEWICZ, Individually; and on behalf of THE ESTATE OF KEVIN MORRIS, by and through her respective counsel, and Plaintiff JACK MORRIS, individually and as Successor in Interest to KEVIN MORRIS, deceased, by and through his respective counsel, are to abide by the Stipulation re Protective Order for Depositions and Documents concurrently filed herewith.

DATED: July 22, 2019

Karen E. Scott

KAREN E. SCOTT  
UNITED STATES MAGISTRATE JUDGE

**PROOF OF SERVICE**  
**STATE OF CALIFORNIA, COUNTY OF ORANGE**

I am over the age of 18 and not a party to the within action; I am employed by WOODRUFF, SPRADLIN & SMART in the County of Orange at 555 Anton Boulevard, Suite 1200, Costa Mesa, CA 92626-7670.

On July 17, 2019, I served the foregoing document(s) described as  
[PROPOSED] PROTECTIVE ORDER FOR DEPOSITIONS AND DOCUMENTS

- by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list;
- (BY MAIL)** I placed said envelope(s) for collection and mailing, following ordinary business practices, at the business offices of WOODRUFF, SPRADLIN & SMART, and addressed as shown on the attached service list, for deposit in the United States Postal Service. I am readily familiar with the practice of WOODRUFF, SPRADLIN & SMART for collection and processing correspondence for mailing with the United States Postal Service, and said envelope(s) will be deposited with the United States Postal Service on said date in the ordinary course of business.
- (BY ELECTRONIC SERVICE)** by causing the foregoing document(s) to be electronically filed using the Court's Electronic Filing System which constitutes service of the filed document(s) on the individual(s) listed on the attached mailing list.
- (BY OVERNIGHT DELIVERY)** I placed said documents in envelope(s) for collection following ordinary business practices, at the business offices of WOODRUFF, SPRADLIN & SMART, and addressed as shown on the attached service list, for collection and delivery to a courier authorized by to receive said documents, with delivery fees provided for. I am readily familiar with the practices of WOODRUFF, SPRADLIN & SMART for overnight delivery, and said collection and processing of documents for envelope(s) will be deposited for receipt by on said date in the ordinary course of business.
- (BY FACSIMILE)** I caused the above-referenced document to be transmitted to the interested parties via facsimile transmission to the fax number(s) as stated on the attached service list.
- (BY PERSONAL SERVICE)** I delivered such envelope(s) by hand to the offices of the addressee(s).
- (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the above is true and correct.

Executed on July 17, 2019 at Costa Mesa, California.

/s/ Debra C. Koppel  
Debra C. Koppel

**DOROTHY "DEE" AGRACEWICZ, etc. v. THE COUNTY OF ORANGE**  
**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF**  
**CALIFORNIA**

**CASE NO.: 8:19-cv-00251-JLS-KESx  
(Consolidated with Case No. 8:19-cv-00350-JLS-KESx)  
UNITED STATES DISTRICT JUDGE JOSEPHINE L. STATON  
UNITED STATES MAGISTRATE JUDGE KAREN E. SCOTT  
SERVICE LIST**

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**KEVIN MORRIS**

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as Successor in Interest to KEVIN  
MORRIS, deceased**

4/25/19